UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

ATLANTIC HEALTH SYSTEM, INC., AHS HOSPITAL CORP., and ATLANTIC AMBULANCE CORP.,

: Civil Action No. 2:08-cv-01661

: (JAG)

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CERTIFICATION OF

MARIA L. ZARRELLA. ESQ.,

IN REPLY AND RESPONSE TO

: DEFENDANTS' REPLY AND OPPOSITION TO PLAINTIFFS' MOTION FOR

SUMMARY JUDGMENT

Plaintiffs.

v .

NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA, a member

company of American International Group and AMERICAN INTERNATIONAL GROUP, individually,

Defendants.

MARIA L. ZARRELLA, ESQ., of full age, hereby certifies and says:

- 1. I am an attorney-at-law of the State of New Jersey associated with the law firm of Bubb Grogan & Cocca, LLP, attorneys for Plaintiffs Atlantic Health System, Inc., AHS Hospital Corp., and Atlantic Ambulance Corp. (collectively "Plaintiffs").
- 2. I make this Certification upon personal knowledge and in reply and response to the opposition and reply filed by Defendants National Union Fire Insurance Company of Pittsburgh,

PA, and American International Group, (collectively "Defendants").

3. Attached hereto as **Exhibit A** is a true and correct copy of the deposition transcript of Defendants' Expert, Thomas Newman. Mr. Newman was deposed on December 9, 2010, and this office received a copy of the transcript on or about December 22, 2010.

I hereby certify the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Maria L./Zarrella

Dated: January 26, 2011